

**BEFORE THE MISSOURI REAL ESTATE COMMISSION**

MISSOURI REAL ESTATE COMMISSION	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 13-0567 RE
	)	
AHNA D. VAOIFI	)	
	)	
Respondent.	)	

**FINDINGS OF FACT, CONCLUSIONS OF LAW  
AND DISCIPLINARY ORDER**

On or about November 25, 2013, the Administrative Hearing Commission entered its Consent Order in the case of *Missouri Real Estate Commission v. Ahna D. Vaoifi*, No. 13-0567 RE. In that Consent Order, the Administrative Hearing Commission found that Respondent Ahna D. Vaoifi's real estate broker associate license (license no. 2002010134) is subject to disciplinary action by the Missouri Real Estate Commission ("Commission") pursuant to § 339.100.2(2), (16), and (18), RSMo.<sup>1</sup>

The Commission has received and reviewed the record of the proceedings before the Administrative Hearing Commission including the Consent Order of the Administrative Hearing Commission. The record of the Administrative Hearing Commission is incorporated herein by reference in its entirety.

Pursuant to notice and §§ 621.110 and 339.100.3, RSMo, the Commission held a hearing on April 2, 2014, at the Division of Professional Registration, 3605 Missouri Boulevard, Jefferson City, Missouri, for the purpose of determining the appropriate disciplinary action against Respondent's license. All of the members of the Commission were present throughout

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<sup>1</sup> All statutory references are to the Revised Statutes of Missouri 2000, as amended, unless otherwise indicated.

the meeting. Charles Davis participated through conference call. Further, each member of this Commission has read the Consent Order of the Administrative Hearing Commission. The Commission was represented by Assistant Attorney General Craig Jacobs. Respondent having received proper notice and opportunity to appear did appear in person without legal counsel. After being present and considering all of the evidence presented during the hearing, the Commission issues the following Findings of Facts, Conclusions of Law and Order.

Based upon the foregoing the Commission hereby states:

I.

**FINDINGS OF FACT**

1. The Commission is an agency of the state of Missouri created and established pursuant to § 339.120, RSMo, for the purpose of licensing all persons engaged in the practice as a real estate broker or salesperson in this state. The Commission has control and supervision of the licensed occupations and enforcement of the terms and provisions of §§ 339.010-339.205 and 339.710-339.855, RSMo.

2. The Commission hereby adopts and incorporates by reference the Consent Order, and the record of the Administrative Hearing Commission in *Missouri Real Estate Commission v. Ahna D. Vaoifi*, Case No. 13-0567 RE, issued November 25, 2013, in its entirety and takes official notice thereof.

3. The Commission set this matter for disciplinary hearing and served notice of the disciplinary hearing upon Respondent in a proper and timely fashion. Respondent appeared in person without legal counsel at the hearing before the Commission.

4. This Commission licensed Respondent Ahna D. Vaoifi as a real estate broker associate, license number 2002010134. Respondent's broker associate license was current at all times relevant to this proceeding.

## II.

### CONCLUSIONS OF LAW

5. This Commission has jurisdiction over this proceeding pursuant to §§ 621.110 and 339.100, RSMo.

6. The Commission expressly adopts and incorporates by reference the Consent Order issued by the Administrative Hearing Commission dated November 25, 2013, in *Missouri Real Estate Commission v. Ahna D. Vaoifi*, Case No. 13-0567 RE, takes official notice thereof, and hereby enters its Conclusions of Law consistent therewith.

7. As a result of the foregoing, and in accordance with the Administrative Hearing Commission's Consent Order dated November 25, 2013, Respondent's real estate broker associate license, number 2002010134, is subject to disciplinary action by the Commission pursuant to § 339.100.2(2), (16), and (18), RSMo.

8. The Commission has determined that this Order is necessary to ensure the protection of the public.

## III.

### ORDER

Having fully considered all the evidence before the Commission, and giving full weight to the Consent Order of the Administrative Hearing Commission, it is the **ORDER** of the Commission that the real estate broker associate license of Ahna D. Vaoifi (license no. 2002010134) is hereby placed on THREE (3) YEARS PROBATION. During Respondent's probation, Respondent shall be entitled to practice under her respective license provided that Respondent adheres to all of the terms stated herein. The period of probation shall constitute the "disciplinary period."

The terms and conditions of the disciplinary period are as follows:

A. Respondent shall keep the MREC apprised at all times, in writing, of Respondent's current addresses and telephone numbers at each place of residence and business. Respondent shall notify the MREC within ten (10) days of any change in this information.

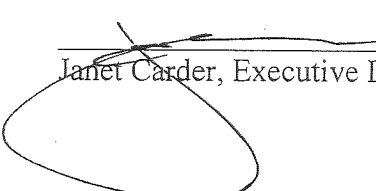
B. Respondent shall maintain full compliance with all provisions of Chapter 339, RSMo, and all rules and regulations promulgated by the MREC.

C. Upon the expiration and successful completion of the disciplinary period, Respondent's respective real estate broker associate license shall be fully restored if all other requirements of law have been satisfied; provided, however, that in the event the MREC determines that Respondent has violated any term or condition of this Order, the MREC may, in its discretion, after an evidentiary hearing, suspend, revoke, or otherwise lawfully discipline Respondent's real broker associate license.

The Commission will maintain this Order as an open, public record of the Commission as provided in Chapters 339, 610 and 324, RSMo.

SO ORDERED, EFFECTIVE THIS 9th DAY OF April, 2014.

MISSOURI REAL ESTATE COMMISSION

  
\_\_\_\_\_  
Janet Carder, Executive Director

Before the  
Administrative Hearing Commission  
State of Missouri



MISSOURI REAL ESTATE COMMISSION,

Petitioner,

vs.

AHNA D. VAOIFI,

Respondent.

No. 13-0567 RE

**CONSENT ORDER**

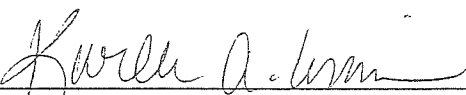
The licensing authority filed a complaint. Section 621.045<sup>1</sup> gives us jurisdiction.

On November 21, 2013, the parties filed a "Joint Motion for Consent Order, Joint Stipulation of Facts and Conclusions of Law, and Waiver of Decision." Our review of the document shows that the parties have stipulated to certain facts and waived their right to a hearing before us. Because the parties have agreed to these facts, we incorporate them into this order and adopt them as stipulated. *Buckner v. Buckner*, 912 S.W. 2d 65, 70 (Mo. App., W.D. 1995). We conclude that the licensee is subject to discipline under § 339.100.2(2), (16) and (18). We incorporate the parties' proposed findings of fact and conclusions of law into this Consent Order. We certify the record to the licensing agency under § 621.110.

The only issue before this Commission is whether the stipulated conduct constitutes cause to discipline the license. The appropriate disciplinary action is not within our power to decide; that is subject to the licensing authority's decision or the parties' agreement. Section 621.110.

No statute authorizes us to determine whether the agency has complied with the provisions of § 621.045.4. We have no power to superintend agency compliance with statutory procedures. *Missouri Health Facilities Review Comm. v. Administrative Hearing Comm'n*, 700 S.W. 2d 445, 450 (Mo. banc 1985). Therefore, we do not determine whether the agency complied with such procedures.

SO ORDERED on November 25, 2013.

  
KAREN A. WINN  
Commissioner

<sup>1</sup>Statutory references are to RSMo Supp. 2011 unless otherwise noted.

BEFORE THE  
ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

**FILED**

APR 12 2013

ADMINISTRATIVE HEARING  
COMMISSION

MISSOURI REAL ESTATE  
COMMISSION  
3605 Missouri Blvd.  
P.O. Box 1339  
Jefferson City, MO 65102-1339,

Petitioner,

v.

Case No.

13-0567 RE

AHNA D. VAOIFI  
19709 E 11<sup>th</sup> Terrace North  
Independence, MO 64056  
Telephone: 816-795-7538

Respondent.

**COMPLAINT**

Petitioner, the Missouri Real Estate Commission (MREC), by and through the Missouri Attorney General's office, states for its cause of action as follows:

1. The MREC is an agency of the State of Missouri created and existing pursuant to § 339.120, RSMo Supp 2012<sup>1</sup> for the purpose of executing and enforcing the provisions of §§ 339.010 to 339.180 and §§ 339.710 to 339.860, RSMo (as amended), relating to real estate salespersons and brokers.

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<sup>1</sup>All statutory citations are to the Revised Statutes of Missouri 2000, unless otherwise noted.

2. Respondent Ahna Vaoifi ("Vaoifi") is licensed by the MREC as a real estate broker, license no. 2002010134. Vaoifi's license is, and was at all relevant times herein, current and active.

3. Jurisdiction and venue are proper before the Administrative Hearing Commission pursuant to §§ 621.045 and 339.100.2, RSMo Supp. 2012.

4. On September 28, 2011, Vaoifi pled guilty to Count I of the Information in Case No. 11-00238-01-CR-W-HFS in the Western District Court of Missouri to making a false statement to a federal agent, a class D felony, in violation of 18 U.S.C. § 1001(a)(2).

5. 18 U.S.C. § 1001(a)(2), setting forth the elements of making a false statement, states:

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

.....

(2) makes any materially false, fictitious, or fraudulent statement or representation;

.....

shall be fined under this title [or] imprisoned not more than five years, . . . or both. . . .

6. The charge underlying the criminal case was as follows:

The United States Attorney charges that:

COUNT I  
(False Statement)

On or about December 6, 2010, in or around Grandview, within the Western District of Missouri, the defendant, Ahna Vaoifi, in a matter within the jurisdiction [of] the United States Department of Housing and Urban Development, knowingly and willfully made and caused to be made false, fictitious, and fraudulent material statements and representations, in that the defendant stated and represented to Special Agents Amy Durso and Karen Gleich that her handwriting was not present on two money orders in a home loan file concerning a house at 18509 East 19th Terrace South, Independence, Missouri. These statements and representations were false, as the defendant well knew, because defendant Vaoifi had personally obtained the two money orders from Bank of America on December 28, 2006, one for \$1,000 and one for \$100. In support of a fraudulent home loan application for Vavega and Toaono Tialino, by her own hand, she then altered the two money orders to falsely reflect that they were rent payments to the applicant borrowers, who were her real estate clients. Vaoifi subsequently caused, and aided abetted the causing of, submission of the two money orders in support of the fraudulent loan application, which resulted in the lender making the requested loan to the borrowers, and for which she, as the real estate agent, received a sales commission.

7. On September 28, 2011, the Court placed Vaoifi on probation for a term of five years. Vaoifi was also assessed a \$100 mandatory special assessment and ordered to pay \$50 per month restitution until \$86,047.89 was repaid.



8. The crime of making a false statement to a federal agent is reasonably related to the qualifications, functions or duties of a real estate salesperson or broker.

9. The crime of making a false statement to a federal agent is an offense where an essential element is fraud or dishonesty.

10. The crime of making a false statement to a federal agent is an offense involving moral turpitude.

11. Cause exists to discipline Vaoifi's real estate license pursuant to § 339.100.2(2), (16), (18), and (19), RSMo Supp. 2012, which states:

2. The commission may cause a complaint to be filed with the administrative hearing commission as provided by the provisions of chapter 621 against any person or entity licensed under this chapter or any licensee who has failed to renew or has surrendered his or her individual or entity license for any one or any combination of the following acts:

.....

(2) Making substantial misrepresentations or false promises or suppression, concealment or omission of material facts in the conduct of his or her business or pursuing a flagrant and continued course of misrepresentation through agents, salespersons, advertising or otherwise in any transaction;

.....

(16) Committing any act which would otherwise be grounds for the commission to refuse to issue a license under section 339.040;

.....

(18) Been finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution under the laws of this state or any other state or of the United States, for any offense reasonably related to the qualifications, functions or duties of any profession licensed or regulated under this chapter, for any offense an essential element of which is fraud, dishonesty or an act of violence, or for any offense involving moral turpitude, whether or not sentence is imposed[.]

(19) Any other conduct which constitutes untrustworthy, improper or fraudulent business dealings, demonstrates bad faith or incompetence, misconduct, or gross negligence[.]

12. Section 339.040.1, RSMo Supp. 2012, setting forth the grounds for issuance of a real estate license, states:

Licenses shall be granted only to persons who present, and corporations, associations, partnerships, limited partnerships, limited liability companies, and professional corporations whose officers, managers, associates, general partners, or members who actively participate in such entity's brokerage, broker-salesperson, or salesperson business present, satisfactory proof to the commission that they:

(1) Are persons of good moral character; and

(2) Bear a good reputation for honesty, integrity, and fair dealing; and

(3) Are competent to transact the business of a broker or salesperson in such a manner as to safeguard the interest of the public.

13. Based on the facts alleged above, Vaoifi has made substantial misrepresentations and/or false promises, and/or suppression, concealment, and/or omission of material facts in the conduct of her business, providing cause to discipline her license pursuant to § 339.100.2(2), RSMo Supp. 2012.

14. Based on facts alleged above, Vaoifi has engaged in conduct that would be grounds for the MREC to refuse to issue a license under section 339.040, providing cause to discipline her license pursuant to § 339.100.2(16), RSMo Supp. 2012.

15. Vaoifi's guilty plea to the crime of making a false statement to a federal agent, provides cause to discipline Vaoifi's license pursuant to § 339.100.2(18), RSMo Supp. 2012, in that Vaoifi pled guilty in a criminal prosecution under the laws of the United States 1) to an offense that is reasonably related to the qualifications, functions and/or duties of a real estate broker, 2) to an offense of which an essential element is fraud, dishonesty and/or an act of violence, and/or 3) to an offense which involves moral turpitude.

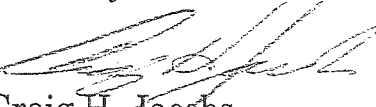
16. Vaoifi's conduct, as alleged in this Complaint, constitutes untrustworthy, improper, and/or fraudulent business dealings and/or demonstrates bad faith, incompetence, misconduct, and/or gross negligence, providing cause to discipline Vaoifi's license under § 339.100.2(19), RSMo Supp. 2012.

17. Cause exists to discipline Vaoifi's license as a real estate broker pursuant to § 339.100.2(2), (16), (18), and/or (19), RSMo Supp. 2012.

WHEREFORE, Petitioner requests that the Administrative Hearing Commission conduct a hearing in this case pursuant to Chapter 621, RSMo, and issue its Findings of Fact and Conclusions of Law determining that Petitioner may take disciplinary action against the license of Respondent, Ahna Vaoifi, as a real estate broker for the violations noted above, and for such other relief as the Commission deems appropriate.

Respectfully submitted,

CHRIS KOSTER  
Attorney General



Craig H. Jacobs  
Assistant Attorney General  
Missouri Bar No. 48358

Supreme Court Building  
207 West High Street  
P.O. Box 899  
Jefferson City, MO 65102  
Telephone: 573-751-1143  
Telefax: 573-751-5660

Attorneys for Petitioner

BEFORE THE  
ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

MISSOURI REAL ESTATE )  
COMMISSION, )

Petitioner, )

v. )

AHNA D. VAOIFI, )

Respondent. )

Case No. 13-0567 RE

**FILED**

NOV 21 2013

ADMINISTRATIVE HEARING  
COMMISSION

JOINT MOTION FOR CONSENT ORDER,  
JOINT STIPULATION OF FACTS AND CONCLUSIONS OF LAW,  
AND  
WAIVER OF DECISION  
BY THE ADMINISTRATIVE HEARING COMMISSION

Respondent Ahna D. Vaoifi ("Vaoifi") and Petitioner Missouri Real Estate Commission ("MREC") enter into this *Joint Motion for Consent Order, Joint Stipulation of Facts and Conclusions of Law, and Waiver of Hearing Before the Administrative Hearing Commission* ("Joint Stipulation") for the purpose of resolving the Complaint filed against Respondent. Pursuant to the rules governing practice and procedure before the Administrative Hearing Commission ("Commission")(1 CSR 15-3.446(5)) and pursuant to the terms of § 536.060, RSMo<sup>1</sup>, as it is made applicable to the Commission by § 621.135, RSMo, the parties move for a consent order and waive the right to

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<sup>1</sup>All references are to the 2000 Revised Statutes of Missouri unless otherwise noted.

a decision after the hearing held on October 11, 2013 in the above-styled case by the Commission, and jointly stipulate and agree that a final disposition of the issues before the Commission may be effectuated as described below.

Vaoifi acknowledges that she understands the various rights and privileges afforded her by law, including the right to appear and be represented by legal counsel; the right to have all charges proven upon the record by competent and substantial evidence; the right to present evidence on her behalf at the hearing; the right to a decision upon the record of the hearing by a fair and impartial administrative hearing commissioner concerning the charges pending against her; the right to a ruling on questions of law by the Commission; the right to a claim for attorney fees and expenses; and the right to obtain judicial review of the decision of the Commission. Being aware of these rights provided Vaoifi by operation of law, Vaoifi knowingly and voluntarily waives each and every one of these rights and freely enters into this Joint Stipulation. Vaoifi further agrees to abide by the terms of this document as they pertain to her.

Vaoifi acknowledges that she received a copy of the Complaint in this case, which was filed with the Commission on April 12, 2013. Vaoifi stipulates that the factual allegations contained in this Joint Stipulation are true and stipulates with the MREC that Vaoifi's license as a real estate

broker associate, license no. 2002010134, is subject to disciplinary action by the MREC in accordance with the provisions of Chapter 621, RSMo, and § 339.100.2(2), (16), and (18), RSMo (Supp. 2012).

### **I. JOINT STIPULATION**

Based upon the foregoing, the MREC and Vaoifi jointly stipulate to the following findings of fact and conclusions of law in lieu of the facts and conclusions of law as alleged in the Complaint filed in this case, and request that the Commission adopt the Joint Proposed Findings of Fact and the Joint Proposed Conclusions of Law as the Commission's Findings of Fact and Conclusions of Law.

### **JOINT PROPOSED FINDINGS OF FACT**

1. Respondent Ahna Vaoifi ("Vaoifi") is licensed by the MREC as a real estate broker associate, license no. 2002010134. Vaoifi's license is current and active.
2. On September 28, 2011, Vaoifi pled guilty to Count I of the Information in Case No. 11-00238-01-CR-W-HFS in the Western District Court of Missouri to making a false statement to a federal agent, a class D felony, in violation of 18 U.S.C. § 1001(a)(2).
3. 18 U.S.C. § 1001(a)(2), setting forth the elements of making a false statement, states:

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

.....

(2) makes any materially false, fictitious, or fraudulent statement or representation;

.....

shall be fined under this title [or] imprisoned not more than five years, . . . or both. . . .

4. The charge underlying the criminal case was as follows:

The United States Attorney charges that:

COUNT I  
(False Statement)

On or about December 6, 2010, in or around Grandview, within the Western District of Missouri, the defendant, Ahna Vaoifi, in a matter within the jurisdiction [of] the United States Department of Housing and Urban Development, knowingly and willfully made and caused to be made false, fictitious, and fraudulent material statements and representations, in that the defendant stated and represented to Special Agents Amy Durso and Karen Gleich that her handwriting was not present on two money orders in a home loan file concerning a house at 18509 East 19th Terrace South, Independence, Missouri. These statements and representations were false, as the defendant well knew, because defendant Vaoifi had personally obtained the two money orders from Bank of America on December 28, 2006, one for \$1,000 and one for \$100. In support of a fraudulent home loan application for Vavega and Toaono Tialino, by her



own hand, she then altered the two money orders to falsely reflect that they were rent payments to the applicant borrowers, who were her real estate clients. Vaoifi subsequently caused, and aided abetted the causing of, submission of the two money orders in support of the fraudulent loan application, which resulted in the lender making the requested loan to the borrowers, and for which she, as the real estate agent, received a sales commission.

5. On September 28, 2011, the Court placed Vaoifi on probation for a term of five years. Vaoifi was also assessed a \$100 mandatory special assessment and ordered to pay \$50 per month restitution until \$86,047.89 was repaid.

#### JOINT PROPOSED CONCLUSIONS OF LAW

6. The crime of making a false statement to a federal agent is reasonably related to the qualifications, functions or duties of a real estate salesperson or broker.

7. The crime of making a false statement to a federal agent is an offense where an essential element is fraud or dishonesty.

8. The crime of making a false statement to a federal agent is an offense involving moral turpitude.

9. Based on the facts alleged above, Vaoifi has made substantial misrepresentations and/or suppression, concealment, and/or omission of material facts in the conduct of her business.

10. The offense of making a false statement to a federal agent is an act which would otherwise be grounds for the MREC to refuse to issue a license under Section 339.040.1, RSMo Supp. 2012, which states:

Licenses shall be granted only to persons who present, and corporations, associations, partnerships, limited partnerships, limited liability companies, and professional corporations whose officers, managers, associates, general partners, or members who actively participate in such entity's brokerage, broker-salesperson, or salesperson business present, satisfactory proof to the commission that they:

(1) Are persons of good moral character; and

...

(3) Are competent to transact the business of a broker or salesperson in such a manner as to safeguard the interest of the public.

11. Based on the findings of fact and conclusions of law stipulated to herein, cause exists to discipline Vaoifi's real estate license pursuant to § 339.100.2(2), (16), and (18), RSMo (Supp. 2012), which states:

2. The commission may cause a complaint to be filed with the administrative hearing commission as provided by the provisions of chapter 621 against any person or entity licensed under this chapter or any licensee who has failed to renew or has surrendered his or her individual or entity license for any one or any combination of the following acts:

.....

(2) Making substantial misrepresentations or false promises or suppression, concealment or omission of material facts in the conduct of his or her business or pursuing a flagrant and continued course of misrepresentation through agents, salespersons, advertising or otherwise in any transaction;

.....

(16) Committing any act which would otherwise be grounds for the commission to refuse to issue a license under section 339.040;

.....

(18) Been finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution under the laws of this state or any other state or of the United States, for any offense reasonably related to the qualifications, functions or duties of any profession licensed or regulated under this chapter, for any offense an essential element of which is fraud, dishonesty or an act of violence, or for any offense involving moral turpitude, whether or not sentence is imposed[.]

## **II. JOINT ORDER**

Based on the foregoing, the parties hereby mutually agree and stipulate that the following shall constitute the order subject to the following terms and conditions. This order shall become effective immediately upon the issuance of the consent order of the Commission without further action by either party:

1. The parties request that the Administrative Hearing Commission issue a Consent Order finding that grounds exist under § 339.100.2(2), (16), and (18), RSMo, for the MREC to take disciplinary action against Vaoifi's license as a real estate broker associate.

2. This Joint Stipulation does not bind the MREC or restrict the remedies available to it concerning the discipline that may be imposed after hearing pursuant to § 621.110, RSMo

3. This Joint Stipulation does not bind the MREC or restrict the remedies available to it concerning any future violations by Vaoifi of §§ 339.010-339.205 and 339.710-339.855, RSMo, as amended, or the regulations promulgated thereunder, or of the terms and conditions of this Joint Stipulation.

4. This Joint Stipulation does not bind the MREC or restrict the remedies available to it concerning facts or conduct not specifically mentioned in this Joint Stipulation that are either now known to the MREC or may be discovered.

5. Each party agrees to pay all their own fees and expenses incurred as a result of this case, its litigation, and/or its settlement.

6. The terms of this Joint Stipulation are contractual, legally enforceable, and binding, not merely recital. Except as otherwise contained

herein, neither this Joint Stipulation nor any of its provisions may be changed, waived, discharged, or terminated, except by an instrument in writing signed by the party against whom the enforcement of the change, waiver, discharge, or termination is sought.

7. The parties to this Joint Stipulation understand that the MREC will maintain this Joint Stipulation as an open record of the MREC as required by Chapters 324, 339, and 610, RSMo, as amended.

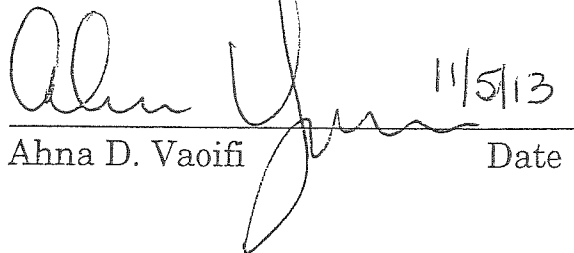
8. Vaoifi, together with her heirs, assigns, agents, partners, employees, representatives and attorneys, does hereby waive, release, acquit and forever discharge the MREC, its respective members, employees, agents and attorneys including former members, employees, agents and attorneys, of, or from any liability, claim, actions, causes of action, fees, costs, expenses and compensation, including, but not limited to, any claim for attorney's fees and expenses, whether or not now known or contemplated, including, but not limited to, any claims pursuant to § 536.087, RSMo, as amended, or any claim arising under 42 U.S.C. § 1983, which now or in the future may be based upon, arise out of, or relate to any of the matters raised in this case or its litigation, or from the negotiation or execution of this Joint Stipulation. The parties acknowledge that this paragraph is severable from the remaining portions of the Joint Stipulation in that it survives in perpetuity even in the

event that any court or administrative tribunal deems this agreement or any portion thereof void or unenforceable.

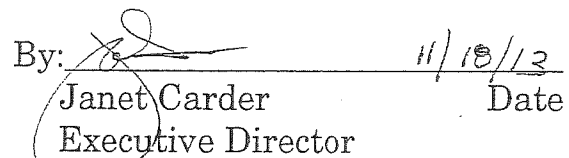
### III. CONCLUSION

In consideration of the foregoing, the parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the complaint filed by the MREC in the above-captioned cause.


RESPONDENT

  
Ahna D. Vaoifi Date 11/5/13

MISSOURI REAL ESTATE  
COMMISSION

By:   
Janet Carder Date 11/18/13  
Executive Director

CHRIS KOSTER  
Attorney General

  
Craig H. Jacobs  
Assistant Attorney General  
Missouri Bar No. 48358

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